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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

In re:	Chapter 13
Luberky A. Guerrero de Mercado aka Luberky Mercado,	Case No. 19-21153-JNP
	Hearing Date: August 21, 2019 at 10:00 a.m.
Debtor.	Judge: Jerrold N. Poslusny, Jr.

OBJECTION TO PLAN CONFIRMATION

JPMorgan Chase Bank, National Association, as servicer for JPMC Specialty Mortgage LLC (the "Secured Creditor"), by its counsel, McCalla Raymer Leibert Pierce, LLC, states the following grounds as and for an Objection to Confirmation of the Debtor's Chapter 13 plan (the "Plan"):

1. Secured Creditor holds the perfected first mortgage on Debtor's real property; the property known as 788 South 7th St., Vineland, NJ 08360 (the "Property"). On July 14, 2003, Luberky A. Guerrero de Mercado aka Luberky Mercado (the "Debtor") and Ramon Mercado (collectively, the "Borrowers") borrowed \$72,000.00 in exchange for a mortgage on the Property (the "Mortgage"). The Mortgage was recorded prepetition on July 30, 2003 in the Cumberland County Clerk's Office. Secured Creditor anticipates filing a proof of claim with arrears of \$1,841.64 on a total claim of \$65,615.11.

2. Debtor's proposed Chapter 13 Plan is silent as to the treatment of the Secured Creditor. Absent a modification addressing the treatment of Secured Creditor, the proposed Plan cannot be confirmed.

3. The proposed Plan fails to acknowledge or accommodate any arrears due. By failing to address the arrears owed to Secured Creditor, Debtor's proposed Plan fails to provide for a successful plan of reorganization. As such, Secured Creditor objects to any proposed plan by Debtor that fails to provide a feasible independent plan of reorganization.

4. Secured Creditor objects to any proposed plan by Debtor that fails to provide a feasible independent plan of reorganization.

WHEREFORE, Secured Creditor respectfully requests that the Court deny confirmation of the Debtor's Chapter 13 Plan for the reasons set forth above and for other relief as the Court may deem just and proper.

Dated: June 26, 2019

McCalla Raymer Leibert Pierce, LLC
Attorneys for JPMorgan Chase Bank, National
Association, as servicer for JPMC Specialty
Mortgage LLC

/s/Melissa Licker

By: Melissa Licker